

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DAVID DEITZEL

Plaintiff,

v.

CIVIL ACTION

SPRINGFIELD TERMINAL RAILWAY
COMPANY

NO. 03-12560-RGS

Defendant.

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

1. State your name, address and age.
2. What is your marital status?
3. What is your present occupation and employer? If retired, what was your last occupation and employer?
4. What are your parents' occupations and employers or, if deceased, their former occupations?
5. What are your children's occupations and employers?
6. What is your spouse's occupation and employer?
7. Are you a member of a union? Is your spouse?
8. Have you served as a juror before? If yes, where and when?
9. Did you serve on a criminal case? Civil case? Grand jury?
10. Have you are any member of your family been a party to a lawsuit? If yes, where and when? Civil or criminal case?
11. Have you or any member of your family been a witness to a lawsuit? If yes, where and when? Civil or criminal case?
12. Have you ever been seriously injured?

13. Has any member of your family ever been seriously injured?
14. Have you ever filed a claim for compensation for your injuries?
15. Has any member of your family ever filed a claim for compensation for their injuries?
16. Have you ever had a claim filed against you? If yes, what claim, and when?
17. Has any member of your family ever had a claim for injuries filed against them? What claim, and when?
18. Was any suit for injuries or death ever filed against you or your family members?
19. Do you have any convictions or conscientious objection which would prevent your sitting in judgment on another person in a claim for damages or injuries?
20. Do you know of any legal reason for your disqualification for jury service?
21. Do you know of any reason why you could not serve as a fair and impartial juror in this particular case? If so, please explain.
22. Are you an employer?
23. Do you have any knowledge of or any relationship with any of the lawyers in this case? Do you or does any member of your family have a business relationship with any of these lawyers or with any member of their family?
24. The defendant in this case is Springfield Terminal Railway Company. If you have any connection with the defendant company, please describe the connection you have.

25. Do you have any friends, relatives, or acquaintances who are working for the defendant? If you do, please describe who and what their job is.

26. Do any of you own any stocks or bonds in the defendant company or other railroad company? Do you have any financial interest in any railroad company?

27. Are you or anyone in your family associated with anyone in the railroad industry and, if so, describe who and what the connection is.

28. Do you or any of your family have anything to do with the investigation, adjustment, or settlement of claims for damages and, if you have, please describe what that connection is.

29. Have you or any of your immediate family ever been employed by an insurance company and, if so, state who and what that employment was.

30. Have you formed or expressed any opinion concerning bringing of a lawsuit for personal injuries or death? If yes, what was or is the nature of that opinion?

31. Do you have any knowledge of or any relationship with the plaintiff?

32. Do you have any conscientious objections to an award for pain and suffering?

33. Do you have any conscientious objections to an award for reduction for earning capacity?

34. Is there any reason that you feel that you could not award a plaintiff's verdict in this matter?

35. Do you have a relationship or does any member of your family have a relationship with anyone in the health care industry or medical industry or pharmaceutical industry?

36. Have you or has any member of your family to your knowledge ever been employed by or related in any way to the insurance industry or have any relationship whatsoever with any insurance company?

37. Have you read or heard anything dealing with the subject matter of lawsuits for damages for personal injury and, if so, how has this affected your ability to act as a juror?

38. Do any of you know of any reason why you think that you could not sit in this case and render a just, fair, honest, and impartial verdict?

39. Assuming the evidence shows that the plaintiff has suffered pain as a result of this injury, do you know of any reason or consciousness which would prevent your awarding to such person a substantial sum for pain and suffering?

40. Is there any reason why you feel that you would not want to serve on this jury?

The Plaintiff,
DAVID DEITZEL,
By his attorney,

/s/
Rudolph V. DeGeorge, II, Esq.
Barish Rosenthal
Three Parkway - Suite 1320
1601 Cherry Street
Philadelphia, PA 19102
(215) 923-8900

CERTIFICATE OF SERVICE

I, Rudolph V. De George, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those identified as non-registered participants on September 26, 2006.

/s/
Rudolph V. De George, II, Esq.